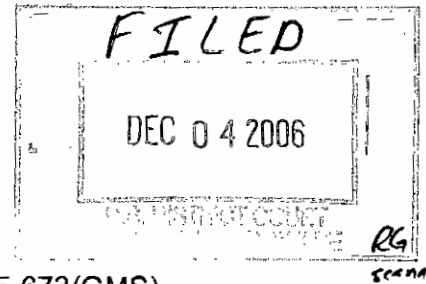


IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE



William A. Newsom,
Plaintiff,

v.

Stanley W. Taylor, et al.,
Defendant.

Civil Action No. 05-673(GMS)

PLAINTIFF'S FIRST SET OF INTERROGATORIES TO FCM, Llc. DEFENDANTS

In accordance with Rule 33 of Federal Rules of Civil Procedure, Plaintiff requests that Defendant First Correctional Medical, Llc., answer the following interrogatories under oath, and that answers be signed by the person making them and be served on plaintiff within 30 days of service of these interrogatories.

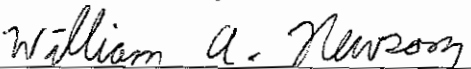
If you cannot answer the following interrogatories in full, after exercising due diligence to secure the information to do so, so state and answer to the extent possible, specifying your inability to answer the remainder and stating whatever information or knowledge you have concerning the unanswered portions.

These interrogatories shall be deemed continuing, so as to require supplemental answers as new and different information materializes.

1. Do you recall treating the plaintiff for a injured finger on or about September 23, 2003 ?
2. After taking x-rays and Dr. Alie attempting closed reduction on plaintiff's fractured and dislocated finger, do you recall sending the plaintiff to an ortopedic surgeon outside of the institution ?
3. What is your companies policy and practice on following the recommendations of medical providers outside of the institutional setteing ?

4. When plaintiff saw Dr. Manifold the outside orthopedic surgeon on October 17, 2003, and he determined that the plaintiff needed significant reconstructive hand surgery; Did you go along with his recommendation ? If so, how ?
5. With your medical knowledge and experience, were you aware that the plaintiff's fractured and dislocated finger if left untreated would become permanently damaged ?
6. Does your medical staff understand that the plaintiff was to be present at his level II medical grievance hearing according to "4.4 Grievance Procedures" in the institution policy ?
7. Why did your medical staff take it upon themselves to make a decision at plaintiff's level II medical grievance hearing without him being present on September 14, 2004 ?
8. Was Dr. Alie board certified in orthopedic medicine to perform closed reduction on plaintiff's fractured and dislocated finger ?
9. Is First Correctional Medical in any way affiliated with CMS or PHS ?

Submitted this 1 day of DECEMBER, 2006.



William A. Newsom
Delaware Correctional Center
1181 Paddock Road
Smyrna, DE 19977

Certificate of Service

I, WILLIAM A. NEWSOM, hereby certify that I have served a true

And correct cop(ies) of the attached: PLAINTIFF'S FIRST SET OF
INTERROGATORIES TO FCM, LLC. DEFENDANTS upon the following
parties/person (s):

TO: UNITED STATES DISTRICT COURT
844 N. KING ST.
LOCKBOX 18
WILMINGTON, DELAWARE
19801

TO: DANIEL L. MCKENY, ESQ.
DANA SPRING MONZO, ESQ.
1225 N. KING ST., SUITE 1100
P.O. BOX 397
WILMINGTON, DELAWARE
19899

TO: _____

TO: _____

BY PLACING SAME IN A SEALED ENVELOPE, and depositing same in the United States Mail at the Delaware Correctional Center, Smyrna, DE 19977.

On this 1ST day of DECEMBER, 2006

William A. Newsom

IM William A. Newson
SBI# 257317 UNIT V-BW-1/B-8
DELAWARE CORRECTIONAL CENTER
1181 PADDOCK ROAD
SMYRNA, DELAWARE 19977



WILMINGTON DE 197
02 DEC 2006 PM 3 L

UNITED STATES DISTRICT COURT
844 N. KING STREET
LOCKBOX 18
WILMINGTON, DELAWARE
19801

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